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MEMO ENDORSED

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October 6, 2020

Via ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Christopher Rodriguez*, 19-cr-862 (VEC)
Request for Additional Hours for Associate Counsel

Dear Judge Caproni:

On August 5, 2020, Your Honor granted the appointment of associate counsel Whitney Schlimbach, Esq. to assist undersigned counsel in the representation of Mr. Rodriguez in the above captioned case. Your Honor granted Ms. Schlimbach an initial 40 hours and I write to request that the Court grant an additional 40 hours to enable Ms. Schlimbach to continue working on the case. The discovery in this case is voluminous, consisting of thousands of pages including but not limited to, contents of smartphones, Facebook and Instagram accounts, documents produced in response to subpoenas, search warrant applications, and other documents. Additionally, there were Title III Interceptions, undercover recordings, and numerous prison calls provided pursuant to Fed. R. Crim. Pro. Rule 16. Ms. Schlimbach's continued assistance is required to help in reviewing discovery and to assist Mr. Rodriguez in doing so while he is incarcerated and does not have access to the entirety of the materials at his facility due to the protective order. Accordingly, I respectfully request an additional 40 hours at this time.

I thank the Court in advance for its time and consideration.

Application GRANTED. Any future requests for approval of time must include a more detailed explanation of the division of labor between the associate and the appointed attorney.

SO ORDERED.



Date: October 7, 2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s

Carla Sanderson, Esq.